

AUSA: Susan E. Fairchild

Telephone: (313) 226-9577

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

Joshua Maxwell

Telephone: (313) 204-5065

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Antonio DE JESUS FLORES, a/k/a Antonio
DEJESUS-FLORES,

Case No.

Case: 2:24-mj-30136

Assigned To : Unassigned

Assign. Date : 4/10/2024

Description: COMP USA V. DE
JESUS FLORES (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 6, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*Title 8, United States Code, Section 1326(a)(1),(b)
(2)*Offense Description*

Unlawful Re-entry of Aggravated Felon After Removal from the United States

This criminal complaint is based on these facts:

On or about April 6, 2024, in the Eastern District of Michigan, Southern Division, Antonio DE JESUS FLORES, a/k/a Antonio DEJESUS-FLORES, an alien from Mexico, who was previously convicted of an aggravated felony offense, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about January 21, 2023, and not having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a) and (b)(2).

☒ Continued on the attached sheet.
Complainant's signature

Joshua Maxwell, Customs and Border Protection

Printed name and title

Sworn to before me and signed in my presence.

Date: April 9, 2024

Judge's signature

City and state: Detroit, Michigan

Anthony P. Patti, United States Magistrate Judge

Printed name and title

AFFIDAVIT

The affiant being duly deposed and sworn states:

1. I, Joshua R. Maxwell, am an Enforcement Officer with the Department of Homeland Security, Customs and Border Protection, and have been employed with the same for over twenty-three years. During my career as a law enforcement officer, I have been involved in various investigations and arrests concerning the reentry of illegal aliens and I have received training in this area. This affidavit is submitted in support of a finding of probable cause and is a summary of information known to law enforcement personnel, other civilian witnesses, and my personal knowledge.

2. On April 6, 2024, at approximately 8:00 am, at the Detroit Ambassador Bridge, Detroit, Michigan, Customs and Border Protection Officers (CBPO), encountered a citizen and national of Mexico, Antonio DE JESUS FLORES, (a/k/a Antonio Dejesus-Flores) who was returned to the United States by the Canada Border Services Agency after they denied him entry into Canada, and who had been previously ordered removed and deported from the United States.

3. On September 15, 2011, DE JESUS FLORES was convicted in the 39th Circuit Court, Lenawee, Michigan, for Criminal Sexual Conduct 2nd Degree. DE JESUS FLORES pleaded guilty and was sentenced to 6 months confinement and 12 months' probation.

4. On September 23, 2011, DE JESUS FLORES was encountered by Immigration and Customs Enforcement (ICE) in Detroit, Michigan. DE JESUS FLORES was served with a Notice to Appear before an Immigration Judge for entering the United States without inspection, in violation of 212(a)(6)(A)(i) of the Immigration and Nationality Act (INA) and being convicted of a Crime Involving Moral Turpitude, in violation of 212(a)(2)(A)(i)(I) of the INA. DE JESUS FLORES was ordered removed from the United States to Mexico by the Immigration Judge. DE JESUS FLORES was physically removed from the United States to Mexico on October 11, 2011.

5. On August 8, 2022, DE JESUS FLORES was apprehended by the United States Border Patrol (USBP) at or near Sasabe, Arizona, for entering the United States without inspection in violation of Section 212(a)(6)(A)(i) of the INA. DE JESUS FLORES's previous order of removal was reinstated via Form I-871.

6. On October 31, 2022, DE JESUS FLORES was convicted in the United States District Court of Arizona, for 8 USC §1326(a) and (b)(1)-Unlawful Reentry Following Removal. DE JESUS FLORES pleaded guilty and was sentenced to 165 days confinement and 24 months of supervised release. DE JESUS FLORES was physically removed from the United States to Mexico on January 21, 2023.

7. On Saturday, April 6, 2024, at Detroit, Michigan, DE JESUS FLORES was apprehended by immigration authorities and subsequently detained.

8. The aforementioned apprehension and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any non-citizen entering or attempting to enter the United States, or any non-citizen present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of noncitizens.

9. DE JESUS FLORES's fingerprints and photograph were captured and entered into the IDENT and IAFIS systems. The results revealed that DE JESUS FLORES, is a citizen of Mexico who has previously been convicted of a felony offense and who has been previously removed from the United States. The record checks reveal that no record exists of DE JESUS FLORES obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal from the United States on or about January 21, 2023.

10. Therefore, based upon the aforementioned facts, I have probable cause to believe that on or about April 6, 2024, in the Eastern District of Michigan, Antonio DE JESUS FLORES, a non-citizen, who was previously convicted of an aggravated felony offense, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about January 21, 2023, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security, in violation of Title 8 United States Code, Section 1326(a) and (b)(2).



Joshua R. Maxwell, Enforcement Officer
U.S. Customs and Border Protection

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Anthony P. Patti
United States Magistrate Judge

Date: April 9, 2024